REMARKS

Applicant expresses appreciation to the Examiner for consideration of the subject patent application. This paper is submitted in response to the non-final office action mailed April 4, 2006. Claims 1-18 are pending and claims 1-18 were rejected. Claim 1 has been amended in this response.

35 U.S.C. § 102(e) Rejections

Claims 1-18 were rejected under 35 U.S.C. § 102(e) as being anticipated by Challenger et al. (U.S. 2005/0028080) (hereinafter *"Challenger"*). Applicant respectfully traverses this rejection. While *Challenger* is of general relevance to the field of the present invention, *Challenger* fails to teach or suggest the specific features claimed.

In general, *Challenger* is directed towards publishing of web documents (para 0018). These documents can be in fragments which are assembled together, and accordingly *Challenger* is concerned primarily with correctly assembling these documents together (para 0019). In assembling these documents together, *Challenger* attempts to correct any broken hyperlinks. (para 0024-0029). These documents are described throughout *Challenger* as web pages, for example, expressed in a markup language such as HTML or XML (para 0008, 0010, 0018, 0021, 0023, and 0033). Nowhere in *Challenger* is there any discussion of combining different document types together or converting from one document format to a second document format. Furthermore, to the extent that *Challenger* checks the validity of documents, this is limited to verifying the existence and/or currency of referenced objects (para 0045).

In contrast, the present invention is generally directed toward a system and method for content management which handles data that is received in a variety of different formats (specification, page 6, line 30). Conversion of data from a first format into a second format can be provided using a data type dictionary (DTD) (page 8, lines 11-34). Data is validated with respect to expiration dates (specification, page 7, line 27-28) and/or converted formats (page 8, lines 11-21). These are features neither taught nor suggested by *Challenger*.

Turning specifically to the claims, claim 1 includes the limitation that a content staging unit "process[es] content from a first format to a second format defined by a data type dictionary." While *Challenger* discusses handling document data in a markup language format, nowhere does *Challenger* discuss converting content format. Furthermore, *Challenger* provides no teaching, such as a data type dictionary, that would be used to define how such conversions are to be performed. Accordingly, Applicant respectfully submits that *Challenger* fails to teach or suggest all of the limitations of claim 1 which is therefore allowable for at least this reason. Claims 2-9 being dependent from claim 1 are therefore also allowable for at least this reason.

With respect to claim 10, this claim includes the limitations of "checking for description file information; backfilling information within the description file if missing; and determining if the content item is valid." While *Challenger* teaches checking validity of reference links within a document, *Challenger* does not teach checking validity based on description file information. Moreover, *Challenger* does not even include a description file as claimed and defined within the present application (for example, see specification, page 6, line 31 – page 7, line 3). Accordingly, Applicant respectfully submits that *Challenger* fails to teach or suggest all of the limitations of claim 10 which is therefore allowable for at least this reason.

With respect to claim 11, this claim includes the limitation of "validating the content item is error-free." As discussed above, validation of content within the context of the present invention does not encompass merely checking the validity of reference links as taught in *Challenger*. One of skill in the art would understand when reading the claims in light of the specification that validation includes checking validity of data with respect to expiry dates and/or data formats, for example as defined by a data type dictionary. Accordingly, Applicant respectfully submits that *Challenger* fails to teach or suggest all of the limitations of claim 11 which is therefore allowable for at least this reason. Claims 12-18, being dependent from claim 11 are therefore also allowable for at least this reason.
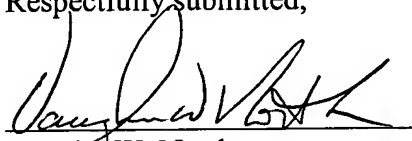
CONCLUSION

In light of the above, Applicant respectfully submits that pending claims 1-18 are in condition for allowance. Therefore, Applicant requests that the current rejection be withdrawn, and that the claims be allowed and passed to issue. If any impediment to the allowance of these claims remains after entry of this Amendment, the Examiner is requested to call Vaughn North at (801) 566-6633 so that such matters may be resolved as expeditiously as possible.

The Commissioner is hereby authorized to charge any additional fee or to credit any overpayment in connection with this Amendment to Deposit Account No. 08-2025.

DATED this 5th day of July, 2006.

Respectfully submitted,

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